

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	
COMMONWEALTH OF VIRGINIA,)	
)	
Defendant.)	CIVIL ACTION NO: 3:12CV59-JAG
)	
and)	
)	
PEGGY WOOD, et al.,)	
)	
Intervenor-Defendants.)	
)	

COMMONWEALTH’S REQUEST FOR STAY

On February 17, 2023, pursuant to Section VII.C of the Settlement Agreement, the Commonwealth filed the Commonwealth’s Request for Relief from Portions of the Settlement Agreement, ECF No. 437 (“Request for Relief”), asking the Court to relieve the Commonwealth of provisions of the Agreement that it has achieved and maintained compliance with for more than one year and that the Independent Reviewer has determined to be in Sustained Compliance.

During the status conference on February 23, 2023, the Parties and the Court discussed the Commonwealth’s Request for Relief and a proposal to change the Independent Reviewer’s review cycle. After the status conference, the Parties and the Independent Reviewer continued to discuss the Commonwealth’s motion, the review cycle, and the substance of particular compliance indicators. The Commonwealth asks the Court to stay its ruling on the Request for Relief while the Parties continue to discuss these issues and work toward resolution. The United States assents to this request.

Respectfully submitted,

FOR THE COMMONWEALTH OF VIRGINIA:

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of March, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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